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June 18, 2021

VIA ECF

Honorable Kimba M. Wood MEMO ENDORSED
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

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Re: Stay You, LLC v. H&M Hennes & Mauritz L.P., Case No. 1:20-cv-01396-KMW-KNF

Dear Judge Wood:

We represent Defendant H&M Hennes & Mauritz L.P. ("Defendant" or "H&M"). <u>Pursuant to Your Honor's Individual Rule 5B</u>, Defendant respectfully requests to file under seal the following documents:

- Defendant's Memorandum of Law in Support of Its Motion for Summary Judgment ("Defendant's Memo");
- Defendant's Local Rule 56.1 Statement of Undisputed Material Facts in Support of Its Motion for Summary Judgment ("Defendant's 56.1 Statement"); and
- Defendant's Exhibit 109.

Attorneys for the parties corresponded pursuant to Your Honor's Individual Rule 5B, and Plaintiff's counsel required Defendant's Exhibit 109 to be filed under seal as it contains sensitive sales information. Defendant's Memo and Defendant's 56.1 Statement, which both mention the information contained in Defendant's Exhibit 109 are being filed under seal for the same reason.

6/23/21

- KMW

SO ORDERED, N.Y., N.Y.

KIMBA M. WOOD

U.S.D.J.

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Pursuant to Your Honor's Individual Rule 5B, Defendant's counsel sent Plaintiff's counsel an email on June 18, 2021 instructing Plaintiff's counsel to file a letter with this Court explaining the need to seal or redact the materials within three days of the filing.

Respectfully submitted,

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Darren W. Saunders